IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY, IOWA, et al.,

Debtors.

Chapter 11 Bankruptcy Case No. 23-00623

CONSENT MOTION TO EXTEND TIME (re Admin Claim #40013)

COMES NOW Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust, and in support of this Motion respectfully states:

- 1. The Official Committee of Mercy Pensioners filed with Epiq (the Claims Agent) Administrative Claim #40013, in the amount of \$1,467,741.94. The Administrative Claim was filed pursuant to a previous Order issued by this Court, setting forth the procedure for timely filing of Administrative Claims.
- 2. The current deadline for the Trustee to object to Administrative Claims is November 6, 2024.
- 3. The Trustee and his counsel need more time to examine and evaluate Administrative Claim #40013.
- 4. The Trustee via counsel has consulted with the claimant who signed the Administrative Claim, and the claimant consents to the Trustee's request for an additional thirty days to object to Administrative Claim #40013.
- 5. Good cause therefore exists to extend the deadline for the Trustee to object to Administrative Claim #40013 to and including December 6, 2024.

WHEREFORE, the Liquidation Trustee respectfully prays this Court enter and enroll an Order granting the Liquidation Trustee, and only the Liquidation Trustee, through

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and including December 6, 2024, to object to Administrative Claim #40013, and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam

Eric W. Lam, AT0004416 SIMMONS PERRINE MOYER BERGMAN PLC 115 Third Street SE, Suite 1200 Cedar Rapids, IA 52401 Tel: 319-366-7641; Fax: 319-366-1917

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 $\underline{elam@simmonsperrine.com}$

ATTORNEY FOR LIQUIDATION TRUSTEE

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 15^{th} day of October, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Kelly Carmichael

 $MHLT/Pldgs/BA\ 23-00623-Drafts/Mtn\ to\ Extend\ Time\ to\ Obj\ to\ Admin\ Claim\ \#40013.101424.1253.ewl$